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December 3, 2019

MEMO ENDORSED

By ECF


Hon. Kenneth M. Karas, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Re: In re Specialist and Other Vessel Owner Limitation Actions
Lead Docket No.: 16-cv-4643 (KMK)
Related Nos.: 16-cv-2515, 16-cv-3353, 16-cv-3579, 16-cv-5010, 16-cv-7001

Dear Judge Karas:

We represent Weeks Marine, Inc. ("Weeks") in these cases. Weeks has retained Dr. Jeffrey G. Odel to provide medical expert testimony concerning the medical history and vision of New York Marine Towing's mate on watch on the tug SPECIALIST, Paul Amon. Dr. Odel has advised that it is not possible for him to produce his report by December 15, 2019, the date recently set by the Court for service of expert reports. He advised that his hospital, Columbia University Medical Center, just changed their medical record software and that he is responsible for both learning the system as well as fulfilling his department's obligations regarding the change, which will require his immediate and prolonged attention. This, coupled with the holidays, creates his scheduling issues. Dr. Odel has advised that he will be able to produce his report by January 10, 2020. Accordingly, we respectfully request the Court grant an extension with respect to the service of Dr. Odel's report and corresponding rebuttal reports, if any, as follows:

January 10, 2020	Deadline to serve Dr. Odel's expert report; and
March 15, 2020	Deadline to serve rebuttal expert reports with respect to Dr. Odel's report.



No other dates set forth in Your Honor's November 25, 2019 Order are impacted. (D.E. 521). We have spoken with counsel for Amon's employer, New York Marine Towing, and he has consented to our request, as have counsel for all other parties.

Respectfully submitted,
BETANCOURT, VAN HEMMEN, GRECO & KENYON LLC

By s/ Ronald Betancourt

RB/jc

cc All counsel entered in this case via ECF.

Grand -
to Order
MK
12/4/19